

The Boeing Company
P.O. Box 3707
Seattle, WA 98124-2207

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Office of Air, Waste & Toxics

May 24, 2007
G-1241-WDE-107

Shawn Blocker
RCRA Corrective Action, AWT-121
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

WA 6819

5-24-07

10a

Subject: *Characterization of Caulk in Concrete Pavements Interim Measure
Work Plan Draft Submittal*
Boeing Plant 2, Seattle/Tukwila, Washington
EPA ID No. WAD 00925 6819
RCRA Docket No. 1092-01-22-3008(h)



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Dear Mr. Blocker:

In response to EPA letters dated February 15 and April 11, 2007 declaring that all caulk at Plant 2 was an immediate and ongoing threat requiring interim measures, Boeing is submitting four (4) copies (each with a CD copy attached) of the subject draft Work Plan. Note that a separate CD copy of the work plan is being provided directly to Mr. Hideo Fujita of the Washington Department of Ecology.

We remain troubled by how this matter surfaced and is being framed by EPA. Questions asked in Boeing's February 26, 2007 letter that requested EPA identify the risk, policy and regulatory factors underlying its determination were not all clearly answered in either the April 2007 letter or subsequent discussions. Despite this lack of clarity, Boeing has concluded that compiling and evaluating data are necessary steps toward supporting sound future decisions and actions on the caulk products used in Plant 2 concrete pavements.

As an aside, we must note that the subject caulk material is not "contaminated" with PCBs as was conveyed in EPA's April letter. Instead, many caulk materials were manufactured with PCBs as an intended ingredient, a distinction of critical importance that has been incorporated in the TSCA statute and regulations.

This plan lays out a two-phase process to evaluate the roughly 20 miles of caulk products in concrete pavement that has not already been sampled at Plant 2. In brief, the first phase will selectively sample and characterize caulk to correlate each material's physical aspects with its PCB content. The second phase will apply the criteria developed in the first phase to all caulk in concrete at Plant 2 to map these materials and evaluate possible actions driven by the results.

Please contact me with any questions or comments you may have.

USEPA RCRA



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Sincerely,



Will Ernst
Project Coordinator; Environmental Remediation
M/C 1W-12; 425.891.7724; 206.544.7297 (fax); william.d.ernst@boeing.com

Enclosure

cc: Hideo Fujita, Department of Ecology (by email)
Brad Helland, Department of Ecology (by email, w/o enclosure)
Rudy Rogers, Boeing (by email, w/o enclosure, for TSCA coordination)

